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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA,
SAN FRANCISCO DIVISION

SONOS, INC.,
Plaintiff and Counter-defendant,
v.
GOOGLE LLC,
Defendant and Counter-claimant.

Case No. 3:20-cv-06754-WHA
Consolidated with
Case No. 3:21-cv-07559-WHA

**SONOS, INC.'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED RE SONOS,
INC.'S PROFFER RE REVENUE
ASSOCIATED WITH ACCUSED
PRODUCTS**

I. INTRODUCTION

Pursuant to Civil Local Rule 79-5(f), Sonos, Inc. (“Sonos”) hereby respectfully submits this Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed (“Administrative Motion”) in connection with Sonos’s Proffer re Revenue Associated With Accused Products (“Sonos’s Proffer”). Specifically, Sonos seeks to file under seal the information and/or document(s) listed below:

| DOCUMENT | PORTIONS TO BE SEALED | DESIGNATING PARTY |
|--|-----------------------|-------------------|
| Exhibit A to Caridis Declaration in Support of Sonos’s Proffer | Entire document | Google |
| Exhibit B to Caridis Declaration in Support of Sonos’s Proffer | Entire document | Google |

II. LEGAL STANDARD

Materials and documents may be provisionally filed under seal pursuant to Civil Local Rule 79-5(f) when the document, or portions thereof, “has been designated as confidential by another party or non-party.” *See* L.R. 79-5(f).

III. GOOGLE LLC’S CONFIDENTIAL INFORMATION

Sonos seeks to seal the information and/or document(s) listed in the above table because they may contain information that Google considers Confidential and/or Highly Confidential-Attorneys’ Eyes Only pursuant to the Protective Order entered by this Court. Dkt. 92. Sonos takes no position on the merits of sealing Google’s designated material and expects Google to file one or more declarations in accordance with the Local Rules.

IV. CONCLUSION

In compliance with Civil Local Rule 79-5(d) and (e), unredacted versions of the above-listed documents accompany this Administrative Motion and redacted versions are filed publicly. A proposed order is being filed concurrently herewith. For the foregoing reasons, Sonos respectfully requests that the Court grant Sonos’s Administrative Motion.

1 Dated: May 15, 2023

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and
LEE SULLIVAN SHEA & SMITH LLP

3 By: /s/ Clement S. Roberts
4 Clement S. Roberts

5 *Attorneys for Sonos, Inc.*